



**MOTOROLA**

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**FEB 09 1995**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

February 8, 1995

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Room 222  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Reference: PR Docket No. 92-235  
(Refarming)

On February 8, 1995, representatives of Motorola met with staff in the Wireless Telecommunications Bureau, Office of Plans and Policy, and Office of Engineering and Technology to discuss the above - referenced proceeding. A copy of written material used in the meeting is attached.

Regards,

Stuart Overby  
Assistant Director, Spectrum Planning

SEO:hgn

cc: Jackie Chorney - WTB  
Bob Eckert - OET  
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# USER COALITION REFORMING PROPOSAL

(Example dates assume 1/1/95 effective date of new rules.)	YEAR 2 (e.g., 1/1/1997)	YEAR 12 (e.g., 1/1/2007)	YEAR 18 (e.g., 1/1/2011)	YEAR 26 (e.g., 1/1/2021)
<b>MANUFACTURERS</b>	All new equipment which is sold must be maximum 12.5 KHz* or 12.5 KHz compatible (e.g., dual-mode 25/12.5 KHz; but not single-mode 25 KHz equipment).		All <u>newly</u> type accepted equipment must be maximum 6.25 KHz* or 6.25 HKz compatible. (e.g., dual-mode 12.5/6.25 KHz, but not single-mode 25 KHz or 12.5 KHz equipment).	All new equipment which is sold must be maximum 6.25 KHz* or maximum 12.5 KHz if convertible to 6.25 KHz
<b>URBAN** SYSTEMS</b> Existing Systems		All urban systems must operate at no more than 12.5 KHz* bandwidth to retain primary status.		Must operate at no more than 6.25 KHz* bandwidth to retain primary status.
New Systems***	Must operate at no more than 12.5 KHz* bandwidth to attain primary status.		Must operate at no more than 6.25 KHz* bandwidth to attain primary status.	
<b>RURAL** SYSTEMS</b> Existing Systems				Must operate at no more than 6.25 KHz* to retain primary status.
New Systems***	Must operate at no more than 12.5 KHz* bandwidth to attain primary status.		Must operate at no more than 6.25 KHz* bandwidth to attain primary status.	
<b>SECONDARY OFFSET USERS AT 450-470 MHZ (All Markets)</b>	May attain co-primary status with other new systems if operations are limited to no greater than 12.5 KHz bandwidth.			Must operate at no more than 6.25 KHz* to attain primary status as against all users.

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## **USER COALITION REFORMING PROPOSAL (continued)**

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**\* Bandwidth limitations may be exceeded if the system will operate with efficiency equivalent to or better than the stated bandwidth. For purposes of type acceptance, the radio must be capable of net data throughput of at least 4.8 kbps.**

**\*\* “Urban Systems” are those located within 100 miles of any of the top 50 urban areas listed at Section 90.761. All other areas would be considered “Rural.” Upon request by a petitioning party, other areas of the country may be declared “Urban” upon a showing of increased frequency congestion necessitating early introduction of spectrum efficient technologies.**

**... A “new system” is one which is not functionally integrated with an earlier-installed land mobile radio system. To be considered an “existing system,” the facilities must be in operation prior to the relevant deadline or must be functionally integrated with such a system. For example, a new repeater site which will be used to extend coverage of an existing system and will relay traffic of mobiles currently operating with an existing system would not be considered a “new system.” (See definition of “Land Mobile Radio System” at Section 90.7).**

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# **TECHNOLOGY**

**MOTOROLA MANUFACTURES FDMA, TDMA, AND CDMA PRODUCTS**

**USERS BUY SOLUTIONS, NOT TECHNOLOGY**

**A TWO STEP 12.5/6.25 KHZ PLAN ALLOWS ALL TECHNOLOGY OPTIONS**

**-LOW COST 12.5 FM ANALOG (AVAILABLE TODAY)**

**-APCO PROJECT 25 DIGITAL FDMA**

**-TDMA (MULTIPLE SLOTS IN 25 KHZ)**

**-6.25 ANALOG OR DIGITAL FDMA**



**MOTOROLA**

# **LEVELS OF COMPATIBILITY AND IMPACT ON THE USER**

## **1. SINGLE MODE**

- ABRUPT MIGRATION**

## **2. DUAL MODE**

- A PARTIAL SOLUTION**

## **3. INTEGRATED BACKWARD/FORWARD COMPATIBILITY**

- TOTAL INTEROPERABILITY DURING MIGRATION**